

1 TERI T. PHAM (SBN 193383)

2 tpham@epgrlawyers.com

3 JESSE K. BOLLING (SBN 286267)

4 jbolling@epgrlawyers.com

5 MICHAEL F. PINTO (SBN 340775)

6 mpinto@epgrlawyers.com

7 **ENENSTEIN PHAM GLASS & RABBAT LLP**

8 3200 Bristol Street, Suite 500

9 Costa Mesa, CA 92626

10 Tel.: (714) 292-0262

11 Attorneys for Plaintiffs

12 Global Tech Industries Group, Inc., David Reichman, and Luke Rahbari

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16
17

18 GLOBAL TECH INDUSTRIES GROUP,
19 INC., a NEVADA corporation; DAVID
20 REICHMAN, an individual; and LUKE
21 RAHBARI, an individual,

22 Plaintiffs,

23 v.

24 RICHARD A. HOFMAN, an individual;
25 and DOES 1 through 10, inclusive,

26 Defendants.
27
28

Case No.: 2:24-CV-05615-HDV-MAAx

Hon. District Judge: Hernan D. Vera
Magistrate Judge: Maria A. Audero

**PLAINTIFFS' STATUS REPORT TO
COURT RE DKT# 64 AND 66**

Pursuant to the Court's October 29, 2024 Order [Dkt. 66], Teri T. Pham, Esq., Jesse K. Bolling, Esq., and Michael F. Pinto, Esq. of Enenstein Pham Glass & Rabbat LLP ("collectively EPGR Lawyers"), counsel or record for Plaintiffs Global Tech Industries Group, Inc. ("GTII"), David Reichman, and Luke Rahbari respectfully report to the Court as follows:

Concurrently with the submission of this Report, Plaintiffs David Reichman and Luke Rahbari have filed a Voluntary Dismissal of all of their claims in this action against all Defendants, without prejudice [Dkt #67].

EPGR Lawyers is not privy to any communications between Plaintiff GTII and Defendant Richard Hofman regarding dismissal of the claims by GTII, as set forth in Mr. Hofman's "Notice GTII's Election to Dismiss Action With Prejudice" filed with the Court on October 25, 2024 [Dkt #64]. EPGR Lawyers has received no instruction from the Receiver for Plaintiff GTII regarding dismissal of its claims in this action, or any instruction whatsoever as to how the Receiver wishes to proceed in this action. As indicated in EPGR Lawyers' Motion for Leave of Court to Withdraw as Counsel of Record filed September 26, 2024 ("Motion to Withdraw") [Dkt #42], the Receiver has only instructed that EPGR Lawyers "do nothing further" on behalf of GTII in this action.

EPGR Lawyers has provided copies of all documents filed in this action to the Receiver and his counsel. A copy of this Status Report is also being provided to the Receiver and his counsel. EPGR Lawyers accordingly respectfully requests that the Court grant its Motion to Withdraw.

Dated: November 1, 2024

ENENSTEIN PHAM GLASS AND RABBAT, LLP

By: 

Teri T. Pham
Jesse K. Bolling
Michael F. Pinto
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 3200 Bristol Street, Suite 500, Costa Mesa, CA 92626. On November 1, 2024, I served the document(s) described as:

**PLAINTIFFS DAVID REICHMAN AND AFSHIN LUKE RAHBARI'S STATUS
REPORT TO COURT RE DKT# 64 AND 66**

By the following method of service:

[X] BY ELECTRONIC TRANSFER TO THE CM/ECF SYSTEM ONLY In accordance with Federal Rules of Civil Procedure 5(d)(3), Local Rule 5-4, and the U.S. District Court of the Central District's General Order governing electronic filing, I uploaded via electronic transfer a true and correct copy scanned into an electronic file in Adobe "pdf" format of the above-listed documents to the United States District Court Central District of California's Case Management and Electronic Case Filing (CM/ECF) system, they will be served on all parties of record according to the preferences chosen by those parties within the CM/ECF system. The transmission was reported as complete and without error.

Richard A Hofman
Richard Hoffman Law Offices
29219 Canwood Street No 101
Los Angeles, CA 90010
818-203-6777
818-579-7925 (fax)
hofman.r@gmail.com
Defendant In Pro-Per

 X **BY ELECTRONIC SERVICE:**

I caused the document(s) to be sent to the persons at their respective electronic notification addresses, listed below.

[E-MAIL]

Afshen Luke Rahbari
793 Post Road East, Unit F1
Westport, CT 06880
luke.rahbari@gmail.com

[E-MAIL]

David Reichman
511 6th Avenue, #800
New York, NY 10011
david@davidreichman.com

With copy to Neil Beller, Esq.

1333 N Buffalo Dr. #210
Las Vegas, NV 89128
nbeller@njbltd.com

1 [E-MAIL]

2 **Global Tech Industries Group, Inc.**

3 c/o Paul Strickland, Receiver

4 120 State Ave. Ne, Suite 1014

5 Olympia, WA 98501

6 receiver@gtii-us.com

7 **With copy to William Noall, Esq.**

8 GARMAN TURNER GORDON

9 7251 Amigo Street, Suite 210

10 Las Vegas, NV 89119

11 wnoall@Gtg.legal

12 [X] **(FEDERAL)** I declare under penalty of perjury that the foregoing is true and correct

13 /s/ Johnny G. Balbuena

14 Johnny G. Balbuena